

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
APR 19 2022
SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN SOLORIO-BARAJAS,

Defendant.

1:22-CR-2040-SAB-1

INDICTMENT

Vios: 8 U.S.C. § 1326

Alien in United States After
Deportation
(Count 1)

18 U.S.C. § 1546(a)
Possession and Use of False
Immigration Documents
(Counts 2, 5)

18 U.S.C. § 1546(b)
Use of False Identification
Document for Employment
(Counts 3, 6)

42 U.S.C. § 408(a)(7)(B)
False Representation of a
Social Security Number
(Counts 4, 7)

18 U.S.C. § 982
Forfeiture Allegations

The Grand Jury charges:

INDICTMENT – 1

COUNT 1

On or about March 4, 2022, the Defendant, JUAN SOLORIO-BARAJAS, a citizen and national of Mexico, who had theretofore been denied admission, excluded, deported and removed from the United States, on or about November 19, 2002, at Seattle, Washington; on or about January 23, 2003, at San Ysidro, California; on or about August 23, 2010, at San Ysidro, California; and on or about February 23, 2018, at Del Rio, Texas, was found in the United States, in the Eastern District of Washington, and he did not then have the express consent of the Attorney General, or the Attorney General's successor, the Secretary of the Department of Homeland Security (Title 6, United States Code, Sections 101, 202(3) & (4), 402 and 557), to reapply for admission into the United States, all in violation of 8 U.S.C. § 1326.

COUNT 2

On or about June 29, 2020, in the Eastern District of Washington, the Defendant, JUAN SOLORIO-BARAJAS, did knowingly utter, possess, obtain, accept and receive a falsely made alien registration card prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing that such document was forged, counterfeited, altered, and falsely made, and to have been otherwise procured by fraud and unlawfully obtained, all in violation of 18 U.S.C. § 1546(a).

COUNT 3

On or about June 29, 2020, in the Eastern District of Washington, the Defendant, JUAN SOLORIO-BARAJAS, for the purpose of satisfying a requirement of the employment verification system set forth in 8 U.S.C. § 1324a(b), used a false identification document, to wit, a Permanent Resident Card, knowing or having reason to know that the document was false, in violation of 18 U.S.C. § 1546(b)(2).

COUNT 4

On or about June 29, 2020, in the Eastern District of Washington, the Defendant, JUAN SOLORIO-BARAJAS, for the purpose of obtaining for himself and any other person anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him, when in fact, such number was not the social security account number assigned by the Commissioner of Social Security to him, in violation of 42 U.S.C. § 408(a)(7)(B).

COUNT 5

On or about September 14, 2020, in the Eastern District of Washington, the Defendant, JUAN SOLORIO-BARAJAS, did knowingly utter, possess, obtain, accept and receive a falsely made alien registration card prescribed by statute and

1 regulation for entry into and as evidence of authorized stay and employment in the
2 United States, knowing that such document was forged, counterfeited, altered, and
3 falsely made, and to have been otherwise procured by fraud and unlawfully
4 obtained, all in violation of 18 U.S.C. § 1546(a).
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7 COUNT 6

8 On or about September 14, 2020, in the Eastern District of Washington, the
9 Defendant, JUAN SOLORIO-BARAJAS, for the purpose of satisfying a
10 requirement of the employment verification system set forth in 8 U.S.C. §
11 1324a(b), used a false identification document, to wit, a Permanent Resident Card
12 bearing the name, “Gilberto Esquivel Arteaga,” knowing or having reason to know
13 that the document was false, in violation of 18 U.S.C. § 1546(b)(2).
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17 COUNT 7

18 On or about September 14, 2020, in the Eastern District of Washington, the
19 Defendant, JUAN SOLORIO-BARAJAS, for the purpose of obtaining for himself
20 and any other person anything of value from any person, and for any other
21 purpose, did, with intent to deceive, falsely represent a number to be the social
22 security account number assigned by the Commissioner of Social Security to him,
23 when in fact, such number was not the social security account number assigned by
24 the Commissioner of Social Security to him, in violation of 42 U.S.C.
25 § 408(a)(7)(B).
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1 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

2 The allegations contained this Indictment are hereby realleged and
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4 incorporated by reference for the purpose of alleging forfeitures.

5 Pursuant to 18 USC § 982(a)(6), upon conviction of the offense(s) in
6
7 violation of 18 U.S.C. § 1546 as set forth in this Indictment, the Defendant, JUAN
8 SOLORIO-BARAJAS, shall forfeit to the United States of America, any
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10 conveyance, including any vessel, vehicle, or aircraft used in the commission of
11 the offense(s); and, any property, real or personal that constitutes, or is derived
12 from or is traceable to the proceeds obtained directly or indirectly from the
13 commission of the offense(s), or any property real or personal used or intended to
14 be used to facilitate the commission of the offense(s).
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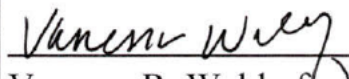
17 If any of the property described above, as a result of any act or omission of
18 the Defendant:


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20 a. cannot be located upon the exercise of due diligence;
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22 b. has been transferred or sold to, or deposited with, a third party;
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24 c. has been placed beyond the jurisdiction of the court;
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26 d. has been substantially diminished in value; or
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28 e. has been commingled with other property which cannot be
divided without difficulty,

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28
3 U.S.C. § 2461(c).
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5 All pursuant to 18 U.S.C. § 982(a)(6) and 28 U.S.C. § 2461(c).
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7 DATED this 19th day of April, 2022.
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15 Vanessa R. Waldref
16 United States Attorney

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19 Richard C. Burson
20 Assistant United States Attorney
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